

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
	: Master Docket No.: 11-cv-05794 (PAC)
ENER1, INC. SECURITIES LITIGATION	:
	: ECF Case
This paper applies to: ALL CASES	:
_____	X

**NOTICE OF PLAINTIFFS' MOTION FOR  
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF  
LITIGATION EXPENSES, AND REIMBURSEMENT AWARD**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and 23(h) and this Court's Order dated February 8, 2013 granting preliminary approval of the proposed settlement and providing for notice, and upon the Declaration of William B. Federman in Support of (I) Plaintiffs' Motion for Final Approval of Settlement and (II) Plaintiffs' Motion for Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Reimbursement Award; the Memorandum of Law in Support of Plaintiffs' Motion for Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Reimbursement Award; the Memorandum of Law in Support of Motion for Final Approval of Proposed Class Action Settlement and Approval of Plan of Allocation; and all other papers and proceedings herein, Lead Counsel will and do hereby move this Court on May 9, 2013, at 4:30 p.m. in the Courtroom of the Honorable Paul A. Crotty, United States District Court Judge for the Southern District of New York, Courtroom 11D, 500 Pearl Street, New York, NY 10007, or other such location and time as set by the Court, for entry of a Judgment awarding attorneys' fees and reimbursement of litigation expenses to Lead Counsel, plus any accrued interest, and awarding a reimbursement award to Plaintiffs. A [Proposed] Judgment Approving Class Action Settlement is attached hereto.

Dated: April 9, 2013

Respectfully submitted,

s/William B. Federman

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-and-

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*Lead Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

This is to certify that on April 9, 2013, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

s/William B. Federman